

## REMARKS

Claims 1-37 are pending in this application. The Office once again has rejected all of the claims under 35 USC 103(a) in view of the patents to Woodhill and MacLeod.

### The Rejection of Claims 1-26

Applicant has studied the Office's comments carefully but still does not understand how the Woodhill reference could possibly support a rejection of these claims, even when taken in combination with MacLeod. With respect to independent claims 1 and 13, Woodhill simply does not show the storage or the manipulation of user-defined data types in a database system, let alone the association of a compression routine with a particular user-defined data type.

The term "user-defined data type" is a term that is well understood in the database arena. This term is used to describe a data type whose inherent structure is not predefined by some industry standard, such as the SQL-99 database-query language standard, but rather is defined elsewhere, typically within the database system itself by a database application or a human user. Applicant's use of this term is consistent with this understanding (*see, e.g.*, Applicant's paragraph [003]).

It is important to note when talking about data types that the phrase "user-defined" refers to the *structure* of the data type – *i.e.*, the way that data appears when it is assigned to the data type – and not to the individual *content* of any pieces of data that might be stored under that type. While the individual content of data stored under a particular user-defined type (UDT) will vary from application-to-application, and even from moment-to-moment within an application, the structure to which that data adheres will remain uniform across all applications that support the UDT. Simply put, the term "user-defined data type" relates to the structure, not to the content, of data.

With this in mind, it seems clear to Applicant that Woodhill simply does not discuss, let alone suggest, storing user-defined data types. The Office once again has cited a passage (col. 6, lines 3-15) in which Woodhill describes assigning "a user-defined priority" to a file, but this "user-defined priority" has nothing whatsoever to do with user-defined data types. In creating the "user-defined priority," Woodhill is allowing a user to

manipulate the content of a particular piece of data; the user does not define the structure that governs that data. Accordingly, Woodhill's "user-defined priority" has no bearing on Applicant's "user-defined data type.

Likewise, because Woodhill does not show or discuss user-defined data types in a database system, it follows that Woodhill cannot suggest the association of a data-compression routine with a UDT. Therefore, Woodhill fails to show or even suggest any of the elements of Applicants's claims 1 and 13, and these claims both are allowable over the Woodhill reference.

MacLeod also fails to show or suggest the storage of data according to a user-defined data type and the association of a data-compression routine with the UDT. Therefore, even in combination, these references do not show all features of the claims. Accordingly, claims 1 and 13 and all claims that depend from them are patentable over Woodhill and MacLeod.

#### The Rejection of Claims 27-37

With respect to claim 27, the Woodhill and MacLeod references, even in combination, do not show or suggest the compression of data within a database table. While it is true that Woodhill mentions data compression in a particular type of computer system and that MacLeod describes a database system having relational tables, Applicant finds absolutely no suggestion in either of the references or in the art in general that one should, or even could, combine the teachings of these references. Nothing in Woodhill would suggest the use of its compression techniques in a relational database table, and nothing in MacLeod would suggest the use of its relational tables with the data-compression scheme described by Woodhill. Absent Applicant's own disclosure, no person of ordinary skill in the art would even have considered attempting to combine Woodhill's teachings on compression with the relational database tables of MacLeod. Accordingly, claim 27 and all of the claims that depend from it are patentable over these references.

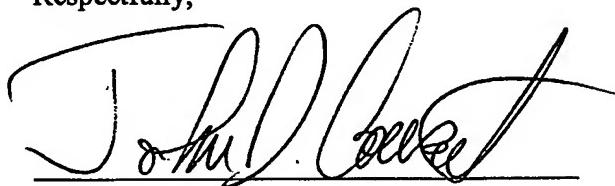
CONCLUSION

The claims all are allowable over the art of record. Applicant asks the Office to reconsider this application and allow all of the claims. Please charge any fees that might be due, excluding the issue fee, to deposit account 50-1673.

Respectfully,

Date:

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